

Melanie L. Cyganowski, Esq.  
Jennifer S. Feeney, Esq.  
OTTERBOURG P.C.  
230 Park Avenue  
New York, New York 10169  
Telephone: (212) 661-9100  
Facsimile: (212) 682-6104

*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----	X
In re	: Chapter 11
	:
PURDUE PHARMA L.P., <i>et al.</i> ,	: Case No. 19-23649 (RDD)
	:
Debtors <sup>1</sup> .	: (Jointly Administered)
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**ELEVENTH MONTHLY FEE STATEMENT OF OTTERBOURG P.C.  
FOR ALLOWANCE OF COMPENSATION FOR SERVICES  
RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED  
AS CO-COUNSEL OF THE AD HOC COMMITTEE'S PROFESSIONALS FOR THE  
PERIOD OF AUGUST 1, 2020 THROUGH AND INCLUDING AUGUST 31, 2020**

Name of Applicant:	Otterbourg P.C.
Applicant's Role in Case:	Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019, [dkt. no. 553]

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Period for Which Compensation is Sought:	August 1, 2020 – August 31, 2020
Total Amount of Fees Incurred:	\$149,450.50
Total Fees Requested (80%):	\$119,560.40
Total Reimbursement of Expenses Incurred:	\$688.96
Total Reimbursement of Expenses Requested (100%):	\$688.96
Total compensation and Reimbursement Requested in this Statement:	\$120,249.36
This is Applicant's:	Eleventh Monthly Fee Statement

Pursuant to the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals*, dated December 2, 2019 [Dkt. No. 553] (the "Fee Assumption Order"), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated November 21, 2019 [Dkt. No. 529] (the "Interim Compensation Order"), Otterbourg P.C. (the "Applicant"), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants in the above-captioned case, hereby submits this Ninth Monthly Fee Statement (the "Fee Statement") for the period of August 1, 2020 - August 31, 2020 (the "Statement Period").

#### **Itemization of Services Rendered and Disbursements Incurred**

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Statement Period with respect to each of the project categories. As reflected in Exhibit A, Applicant incurred \$149,450.50 in fees during the Statement Period. Pursuant to this Fee Statement, Applicant seeks reimbursement for 80% of such fees, totaling \$119,560.40.

2. Annexed hereto as **Exhibit B** is a chart of Applicant's professionals and paraprofessionals, including the standard hourly rate for each attorney and paraprofessional who rendered services to the Debtors in connection with these chapter 11 cases during the Statement Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional. The blended hourly billing rate of attorneys for all services provided during the Statement Period is \$938.96<sup>2</sup>. The Blended hourly rate of all paraprofessionals is \$305.00<sup>3</sup>. A copy of the computer-generated time entries reflecting the time recorded, organized in project billing categories by Applicant is attached hereto as **Exhibit C**.

3. Annexed hereto as **Exhibit D** is a chart of necessary and out-of-pocket expenses incurred by the Applicant in the amount of \$688.96 in connection with providing professional services during the Statement Period. A copy of the computer-generated list of expenses is attached hereto as **Exhibit E**.

4. Applicant, to the best of its knowledge, has not included any fees in connection with or relating to the allocation of value among the Debtors' creditors (the "Allocation Fees"). Pursuant to the Fee Assumption Order, Applicant may request Allocation Fees through a separate application at a later date.

#### **Notice**

5. Applicant will provide notice of this Fee Statement in accordance with the Interim Compensation Order.

WHEREFORE, Applicant, in connection with services rendered as co-counsel to the ad hoc committee of governmental and other contingent litigation claimants, respectfully requests

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<sup>2</sup> The blended hourly billing rate of \$938.96 is derived by dividing the total fees for attorneys of \$148,261.00 by the total hours of 157.9.

<sup>3</sup> The Blended hourly billing rate of \$305.00 for paraprofessionals is similarly derived by dividing the total fees for paraprofessionals of \$1,189.50 by the total hours of 3.9.

(i) compensation in the amount of \$119,560.40 which is equal to 80% of the total amount of reasonable compensation for actual, necessary legal services that Applicant incurred in connection with such services during the Statement Period (*i.e.*, \$149,450.50) and (ii) payment of \$688.96 for the actual, necessary expenses that Applicant incurred in connection with such services during the Statement Period.

Dated: November 13, 2020  
New York, New York

OTTERBOURG P.C.

By: /s/ Melanie L. Cyganowski  
Melanie L. Cyganowski, Esq.  
Jennifer S. Feeney, Esq.  
230 Park Avenue  
New York, New York 10169  
Telephone: (212) 661-9100  
Facsimile: (212) 682-6104

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**EXHIBIT A**

**Fees By Project Category**

**SUMMARY OF COMPENSATION BY PROJECT CODE  
FOR THE STATEMENT PERIOD**

<b>Project Code</b>	<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
PU01	Asset Analysis and Recovery	14.0	\$17,027.00
PU04	Case Administration	17.0	\$21,146.00
PU05	Claims Analysis	108.2	\$88,350.00
PU08	Litigation: Contested Matters, Adversary	4.0	\$3,367.00
PU09	Meetings and Communications w/ AHC	11.8	\$13,006.00
PU11	Plan & Disclosure Statement	6.8	\$6,554.50
	<b>TOTALS:</b>	<b>161.8</b>	<b>\$149,450.50</b>

**EXHIBIT B**

**Professional and Paraprofessional Fees**

**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS  
FOR THE STATEMENT PERIOD**

<b>Professional</b>	<b>Year Admitted</b>	<b>Rate Per Hour</b>	<b>No. of Hrs.</b>	<b>Total Compensation</b>
Melanie L. Cyganowski ("MLC") Partner	1982	\$1315.00	74.9	\$98,493.50
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$850.00	34.1	\$28,985.00
Michael A. Pantzer ("MAP") Associate	2017	\$425.00	48.9	\$20,782.50
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$305.00	3.9	\$1,189.00
	<b>TOTAL</b>		<b>161.8</b>	<b>\$149,450.00</b>



**EXHIBIT C**

**Time Detail**

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter No.: 20186/0002  
Matter Name: CHAPTER 11  
Billing Partner: RL STEHL

November 13, 2020  
BILL NO. 213601

For Services Rendered Through August 31, 2020:

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Phase: PU01	ASSET ANALYSIS AND RECOVERY
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/01/20 MLC	Analysis of Memorandum Review of stipulation and order re discovery and sharing of information among AHC, UCC and NCSG	.50	657.50
08/04/20 MLC	Analysis of Memorandum Review of draft memo from KL describing update from FTI/HL on a potential sale and estate value	1.00	1,315.00
08/10/20 MLC	Correspondence Scheduling of Raymond-Side Cash & Non-Cash Transaction Summary	.30	394.50
08/11/20 MLC	Analysis of Memorandum review of subpoenas served by the NCSG on certain financial institutions	.60	789.00
08/12/20 JSF	Examine Documents Examine Documents: Review of FTI and Houlihan Update on Debtors' Business Plan and Projections	.40	340.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/12/20 MLC	Analysis of Memorandum Review of diligence requests by Ad Hoc Group of Individual Victims	.60	789.00
08/13/20 JSF	Telephone Call(s) Participate in Conference Call with Sackler Advisors to Review Sources and Uses Presentation in Connection with AHC Due Diligence	.80	680.00
08/13/20 MLC	Analysis of Memorandum Review of Raymond Side Cash and Non-Cash Activity Summary	1.10	1,446.50
08/14/20 MLC	Analysis of Memorandum Review and analysis of FTI memo analyzing Sackler Side B finances	1.30	1,709.50
08/17/20 MLC	Conference call(s) Conference call with Monitor re status report	.90	1,183.50
08/17/20 MLC	Draft/revise Review of revised draft of information sharing protocol	.60	789.00
08/18/20 JSF	Examine Documents Examine Documents: Review of Draft Information Sharing Protocol with Debtors	.40	340.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/19/20 JSF	Examine Documents Review Documents: Review Updated Financial Advisor Presentatin on Net Distributable Value to Creditors	.30	255.00
08/19/20 JSF	Examine Documents Examine Docments: Review FTI and Houlihan Presentation on Distributable Value and Analysis	.50	425.00
08/24/20 MLC	Analysis of Memorandum Review and analysis of memorandum summarizing AHC discovery updates	1.20	1,578.00
08/25/20 MLC	Correspondence Correspondence re scheduled discovery and depositions	.60	789.00
08/25/20 MLC	Analysis of Memorandum Review of certain case law re joint and several liability of Purdue with other drug companies	1.10	1,446.50
08/25/20 MLC	Correspondence Correspondence with NSCG and AHC concerning coordination of discovery	.40	526.00
08/26/20 MAP	Review Documents Read Bloomberg Article on Sackler Transfer of Assets	.30	127.50

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November 13, 2020  
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/31/20 MLC	Analysis of Memorandum Review and analysis of summary of David Sackler deposition	1.10	1,446.50
TOTAL PHASE PU01		14.00	\$17,027.00

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Phase: PU04	CASE ADMINISTRATION
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/04/20 MLC	Correspondence Correspondence with NCSG re next steps re meeting with NAACP	.40	526.00
08/05/20 MLC	Correspondence Follow up correspondence re NAACP meetings and agenda	.20	263.00
08/05/20 MLC	Correspondence Correspondence from NCSG re request for additional financial information from debtors	.30	394.50
08/06/20 MLC	Conference call(s) Conference call with NCSG and AHC members and counsel in preparation for conference call meeting with NAACP	1.10	1,446.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/06/20 MLC	Correspondence Correspondence with states concerning outline of discussion with NAACP	.30	394.50
08/07/20 MLC	Analysis of Memorandum Review and analysis of NAACP motion to intervene in preparation for conference call with NAACP	1.40	1,841.00
08/07/20 MLC	Conference call(s) Conference call with NCSG and representatives of the NAACP regarding NAACP discussion items	1.10	1,446.50
08/11/20 MLC	Analysis of Memorandum review of draft stipulation with debtors and Akin re allowing pursuit of insurance coverage	.80	1,052.00
08/12/20 MLC	Analysis of Memorandum Review of revised stipulation with the Debtor and the UCC that would provide the AHC and the UCC joint standing to pursue the insurance coverage through negotiation	.50	657.50
08/13/20 MLC	Conference call(s) Conference call with counsel re preparation for court hearing	.50	657.50
08/14/20 MLC	Correspondence Correspondence from the NAACP concerning role in mediation	.70	920.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/17/20 MLC	Correspondence Correspondence with NCSG re filing of response to NAACP request to intervene in mediation	.30	394.50
08/17/20 MLC	Analysis of Memorandum Review of memorandum drafted by Brown Rudnick re Vilsack call with AHC and NCSG	.40	526.00
08/17/20 MLC	Correspondence Follow up correspondence re NAACP request to intervene and NCSG response	.40	526.00
08/18/20 MLC	Analysis of Memorandum Review of NCSG memorandum filed in support of NAACP motion to intervene	.80	1,052.00
08/20/20 MLC	Correspondence Correspondence re NAACP request to intervene in mediation	.30	394.50
08/21/20 JSF	Examine Documents Review of Update on Stipulation/Agreement with NAACP re: Participation in Case	.20	170.00
08/22/20 MLC	Correspondence Correspondence re suggested change in AHC brief re NAACP request to intervene in mediation	.20	263.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/22/20 MLC	Analysis of Memorandum Review of subpoenas issued by NCSG to various banks seeking documents re Sackler finances	.80	1,052.00
08/24/20 MLC	Correspondence Correspondence with UCC counsel re NAACP stipulation	.40	526.00
08/25/20 JSF	Examine Documents Prepare for Omnibus Hearing - Review Agenda and Applications on for Hearing	.30	255.00
08/25/20 MLC	Conference call(s) Conference call with Andrew Troop and certain States concerning follow up to mediation issues	.30	394.50
08/26/20 JSF	Telephone Call(s) Participate in Telephonic Court Hearing - Omnibus Hearing	1.60	1,360.00
08/26/20 JSF	Telephone Call(s) Participate in Conference Call with Co-Counsel for AHC to Discuss Tasks and Inquiries from AHC Members	.50	425.00
08/26/20 MLC	Court Appearance - General Appeared at court hearing in connection with fee application and related issues	1.60	2,104.00



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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/26/20 MLC	Prepare for Court Appearance Prepared for hearing and court's consideration of Otterbourg pending fee application	.90	1,183.50
08/27/20 MLC	Telephone Call(s) Telcon with Jerry Kulback re Colorado municipality and status of matters	.50	657.50
08/31/20 MLC	Correspondence Correspondence re status of mediation and extension by Judge Drain for additional months	.20	263.00
TOTAL PHASE PU04		17.00	\$21,146.00

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Phase: PU05		CLAIMS ANALYSIS	
<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/03/20 MLC	Correspondence Correspondence with States collecting wet signatures in support of consolidated state POC	.40	526.00
08/03/20 MLC	Correspondence Follow up correspondence with Debtors ' counsel re identification of various claims filed	.20	263.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/04/20 JSF	Examine Documents Review of Initial Data re: Filed Proofs of Claims	.40	340.00
08/04/20 JSF	Examine Documents Review Breakdown of State Data from Filed Proof of Claim for Distribution to States	.30	255.00
08/04/20 MLC	Conference call(s) Conference call with States and Brattle re follow up to proof of claim analysis	.80	1,052.00
08/04/20 MLC	Correspondence Correspondence with States and Jim Donahue concerning next steps after filing of consolidated POC	.40	526.00
08/04/20 MLC	Correspondence Correspondence with NCSG and Debtors' counsel re breakdown of nature of claims filed in case	.30	394.50
08/04/20 MLC	Correspondence Correspondence with NCSG, Pillsbury and States concerning follow up questions re consolidated POC filed by States and non-States	.60	789.00
08/04/20 MLC	Analysis of Memorandum Review of tables of proofs of claims provided by debtors counsel	.30	394.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/04/20 MLC	Correspondence Follow up correspondence with Troop re questions posed to Debtors re certain claims	.20	263.00
08/07/20 MLC	Correspondence Correspondence re preparation of Brattle presentation in support of consolidated POC	.50	657.50
08/09/20 MLC	Correspondence Correspondence among AHC and NCSG states concerning States Proof of Claim presentation	.50	657.50
08/09/20 MLC	Correspondence Correspondence from Debtors re claims presentation	.30	394.50
08/10/20 JSF	Telephone Call(s) Participate in Conference Call with Debtors and AHC Counsel re: Calculation of States' Claim	.70	595.00
08/10/20 MLC	Conference call(s) Conference call with debtors' counsel and AHC counsel re claim calculations and evaluation	.70	920.50
08/11/20 MLC	Conference call(s) Conference call with States and Brattle re proof of claim follow up questions	.90	1,183.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/11/20 MLC	Draft/revise Review of and revisions to draft of Brattle presentation to debtors in support of consolidated state POC	1.10	1,446.50
08/11/20 MLC	Correspondence Correspondence re meeting with DOJ	.20	263.00
08/11/20 MLC	Analysis of Memorandum Review of outline of issues raised by the PIs to the State POC	.80	1,052.00
08/12/20 JSF	Examine Documents Review of the Private Claimants' Diligence Requests to AHC re: States' Consolidated Proof of Claim	.20	170.00
08/12/20 MLC	Correspondence Correspondence with Debtors counsel re PrimeClerk disclosure of consolidated state POC	.20	263.00
08/13/20 JSF	Telephone Call(s) Telephone Call: Participate in Telephone Call with AHC Professionals to Discuss Claims Resolution Process and Work Streams Among Counsel	.70	595.00
08/13/20 JSF	Examine Documents Review of Correspondence from Debtor Requesting Information on States' Claim	.20	170.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/13/20 MLC	Analysis of Memorandum Analysis of memorandum re outline of responses to the PI claimant objections	.90	1,183.50
08/13/20 MLC	Correspondence Correspondence with debtors' counsel re presentation in support of Consolidated States POC	.30	394.50
08/13/20 MLC	Analysis of Memorandum Review of decisions re MDL rulings on derivative issue	1.20	1,578.00
08/14/20 MLC	Conference call(s) Conference call regarding States and muni POCs	1.00	1,315.00
08/15/20 MLC	Draft/revise Reviewed and revised Brattle draft of presentation re consolidated state POC	1.30	1,709.50
08/16/20 MLC	Conference call(s) Conference call with MAP and JSF re research in support of States' claims	.80	1,052.00
08/16/20 MLC	Analysis of Memorandum review and analysis of Outline of Responses re: PI Claimant Objections	.70	920.50
08/16/20 MLC	Analysis of Memorandum Review of MDL rulings on derivative claims	.80	1,052.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/16/20 MAP	Review Documents Read memo regarding UCC questions re: states' claims	.90	382.50
08/16/20 MAP	Telephone Call(s) Phone call with JSF and MLC regarding research questions as to the States' Claims	.80	340.00
08/17/20 JSF	Prepare Legal Papers Prepare Legal Papers: Draft Information Sharing Protocol with Debtors for Consolidated Claims' Analysis	3.60	3,060.00
08/17/20 JSF	Examine Documents Examine Documents: Review of Memo Analyzing PI Claims and Related Issues	.60	510.00
08/17/20 MLC	Correspondence Correspondence with DPW re description of claims filed by States and Territories	.30	394.50
08/17/20 MLC	Correspondence Correspondence with debtors counsel re presentation by Brattle to Cornerstone	.20	263.00
08/17/20 MLC	Correspondence Correspondence with DPW re consolidated state POC and Prime Clerk analysis	.30	394.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/17/20 MLC	Draft/revise Reviewed and revised draft of information sharing protocol with debtors	.90	1,183.50
08/17/20 MLC	Correspondence Correspondence re meeting with debtors, NCSG and Prime Clerk re consolidated POC	.30	394.50
08/17/20 MAP	Draft/revise Review Draft Protocol Sharing Agreement with Debtors regarding States Claim	1.00	425.00
08/17/20 MAP	Review Documents Review Brattle Powerpoint Presentation regarding responses to UCC questions re: States' Claims	.30	127.50
08/17/20 MAP	Research Research legal issues related to UCC objections to consolidated proof of claims	.60	255.00
08/18/20 MLC	Conference call(s) Conference call with States and Brattle re follow-up issues to filing of consolidated POC	.90	1,183.50
08/18/20 MLC	Conference call(s) Conference call with Prime Clerk and States (Andrew Troop) re next steps after filing of States Consolidated POC	.50	657.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/18/20 MLC	Correspondence Correspondence with Prime Clerk and Andrew Troop re manner of describing Consolidated States POC on register	.60	789.00
08/18/20 MLC	Correspondence Review of draft email to Troop and Nachman from KL re claims review process	.20	263.00
08/18/20 MAP	Review Documents Review Ohio MDL Decisions on MTD and MSJ in connection with UCC inquiries re: States' claims	.50	212.50
08/18/20 MAP	Review Documents Review research memo on the Personal Injury Claimants' proofs of claim	.90	382.50
08/18/20 MAP	Review Documents Review District Court Order affirming Bankruptcy Court injunction as to nondebtor Related Parties	1.50	637.50
08/18/20 MAP	Review Documents Review UCC questions to State Claims	.10	42.50
08/19/20 JSF	Telephone Call(s) Participate in Video Conference with AHC, NCSG, Brattle Group and Miller Group to Discuss Presentation to Debtors re: States' Claim	2.00	1,700.00



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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/19/20 JSF	Examine Documents Examine Documents: Review Brattle Group Draft Presentation for Meeting with Debtors to Discuss States' Claim	1.30	1,105.00
08/19/20 MLC	Conference call(s) Conference call with States' counsel with Debtors' counsel providing presentation of data and law in support of consolidated state POC	2.00	2,630.00
08/19/20 MLC	Analysis of Memorandum Review of Motion to Allow Late Filed Proof of Claim to be Treated as Timely Filed Proof of Claim which was filed on behalf of creditor, the City of Bellefontaine Neighbors, Missouri	.60	789.00
08/19/20 MAP	Research Review States' Proofs of Claims and Causes of Action asserted in Proofs of Claim	.50	212.50
08/19/20 MAP	Research Review State Court Dockets in actions brought by states against opioid manufacturers in connection with questions by UCC to states POCs	5.00	2,125.00
08/20/20 MLC	Correspondence Correspondence with DPW re analysis of consolidated state POC	.20	263.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/20/20 MLC	Correspondence Correspondence with DPW re Prime Clerk description of consolidated state POC	.20	263.00
08/20/20 MLC	Correspondence Correspondence re scheduling of meeting with DPW re consolidated state POC	.40	526.00
08/20/20 MAP	Research Review State Court Opioid Litigation to review inquiries by PI Claimants to States' Claims	4.30	1,827.50
08/20/20 MAP	Draft/revise Draft Memo Regarding State Court Litigation in response to PI Claimants' questions re: States Claims	2.10	892.50
08/21/20 JSF	Telephone Call(s) Participate in Virtual Meeting with States, Counsel and Advisors to Prepare for Meeting with Debtors to Review States' Claim Calculation	1.20	1,020.00
08/21/20 JSF	Examine Documents Review of Battle Group Presentation to Debtors re: Claim Calculation	.70	595.00
08/21/20 MLC	Conference call(s) Conference call with AHC subcommittee and NCSG subcommittee re States Consolidated POC and presentation to Debtors	1.00	1,315.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/21/20 MLC	Correspondence Review of email from DPW responding to UCC letter re mediation strategy and posture	.60	789.00
08/21/20 MAP	Research Research State Opioid Litigation in Response to PI Claimants' questions re: States' POC	3.20	1,360.00
08/21/20 MAP	Draft/revise Revise Memo on State Court Opioid Litigation in Response to PI Claimants' questions re: States' POC	4.20	1,785.00
08/22/20 MAP	Draft/revise Revise Memo on State Court Opioid Litigation in Response to PI Claimants' questions re: States' POC	3.30	1,402.50
08/23/20 MLC	Analysis of Memorandum Review of NYS Opioid discovery orders entered in opioid litigation	1.70	2,235.50
08/23/20 MAP	Draft/revise Revise Memo on State Court Opioid Litigation in Response to PI Claimants' questions re: States' POC	2.60	1,105.00
08/24/20 JSF	Telephone Call(s) Participate in Video Conference of States' Advisors Presentation to Debtors re: States' Consolidated Claim	1.60	1,360.00

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08/24/20 JSF	Telephone Call(s) Telephone Call: Participate in Follow-Up Call with Counsel for NCSG and AHC re: Response to Debtor's Legal Inquiries on Claim Calculation	.20	170.00
08/24/20 JSF	Examine Documents Review of E-Mails Outlining Legal Issues in Response to Debtor's Inquiries on States' Claim	.30	255.00
08/24/20 MLC	Analysis of Memorandum Review of memo summarizing state laws in support of consolidated state POC	1.10	1,446.50
08/24/20 MLC	Correspondence Correspondence with states re narrative description of claims on Prime Clerk site	.60	789.00
08/24/20 MLC	Prepare for Meeting Prepared for presentation by Brattle and KL of support for consolidated POC claims	1.20	1,578.00
08/24/20 MLC	Conference call(s) Follow up conference call after Brattle presentation to DPW and Cornerstone	.50	657.50
08/24/20 MLC	Correspondence Correspondence with Brattle concerning presentation on consolidated states claims	.40	526.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/25/20 MLC	Conference call(s) Meeting with States and Brattle concerning Debtors' requests for additional information concerning the Consolidated States POC	1.10	1,446.50
08/25/20 MAP	Correspondence Review email from David Nachman regarding state specific legal analysis	.20	85.00
08/25/20 MAP	Research Legal research regarding email from David Nachman regarding state specific legal issues	2.00	850.00
08/26/20 JSF	Examine Documents Examine Documents - Review Research Provided by States' re: Response to Legal Inquiries from Debtors on States' Claims	1.60	1,360.00
08/26/20 MLC	Analysis of Memorandum Review of research of certain state laws re claims against Purdue	1.50	1,972.50
08/27/20 JSF	Examine Documents Review of Presentation to Debtors of Legal Issues Impacting States' Asserted Claims and Additional Cases to Include	1.80	1,530.00
08/27/20 JSF	Examine Documents Examine Documents: Legal Briefs from States re: Legal Issues Raised by Debtors	.40	340.00

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08/27/20 MLC	Analysis of Memorandum Review and analysis of memorandum providing support for claims against Purdue	2.40	3,156.00
08/27/20 MLC	Telephone Call(s) Telcon with Andrew Troop re research memorandum in support of claims	.30	394.50
08/27/20 JKH	Review/analyze Review state responses re: claims	.70	213.50
08/27/20 JKH	Review/analyze Review of filings from MDL litigation re: abatement claims asserted	.60	183.00
08/27/20 MAP	Review Documents Review documents sent by individual states in connection with PI Claimants' Questions re: States' POC	3.60	1,530.00
08/27/20 MAP	Draft/revise Revise powerpoint presentation on States' responses to PI Claimants' Questions re: States' POC	2.20	935.00
08/28/20 MLC	Analysis of Memorandum Review and analysis of summaries of relevant law for NJ, Idaho, Texas, Indiana, Tennessee and Oregon	2.20	2,893.00

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08/28/20 JKH	Review/analyze Review of state responses to claims questions	1.10	335.50
08/28/20 MAP	Correspondence Organize responses from individual states concerning states' responses to PI Claimants' Questions re: States' POC	.70	297.50
08/28/20 MAP	Review Documents Review responses from states concerning PI Claimants' questions re: States POC	4.40	1,870.00
08/29/20 MLC	Analysis of Memorandum Review and analysis of summaries of state laws of Florida, Michigan and Utah	1.10	1,446.50
08/30/20 JKH	Review/analyze Review of state responses to claims questions	.30	91.50
08/31/20 MLC	Analysis of Memorandum Review and analysis of memorandum summarizing laws of CT	.60	789.00
08/31/20 MLC	Correspondence Correspondence with DPW re description of consolidated claim POC on Prime Clerk web page	.30	394.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/31/20 JKH	Review/analyze Review state responses re: claims questions	.40	122.00
08/31/20 JKH	Prepare Chart(s) Prepare list of state responses received re: claims questions	.60	183.00
08/31/20 MAP	Review Documents Review State Responses to Questions regarding PI Claimants' Objections to States' POC	2.20	935.00
TOTAL PHASE PU05		108.20	\$88,350.00

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Phase: PU08	LITIGATION: CONTESTED MATTERS, ADVERSARY
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/11/20 JSF	Examine Documents Review of Appellate Court Decision on Preliminary Injunction and Impact on Case Issues, Including Release Provisions	.80	680.00



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08/11/20 MLC	Analysis of Memorandum Review and analysis of decision by Judge McMahon upholding Judge Drain's preliminary injunction barring all claimants from continuing actions against non-debtor officers, directors, affiliates and representatives of Purdue	1.30	1,709.50
08/19/20 JSF	Examine Documents Examine Documents: Review of District Court Injunction Decision and Impact on Case	.40	340.00
08/19/20 MAP	Review Documents Review District Order affirming Bankruptcy Court Injunction	.60	255.00
08/19/20 MAP	Research Research on law in connection with District Court Order affirming bankruptcy court injunction	.90	382.50
TOTAL PHASE PU08		4.00	\$3,367.00

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Phase: PU09	MEETINGS & COMMUNICATIONS W/ AD HOC
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/04/20 JSF	Examine Documents Review of Update to AHC Members re: Pending Motions and AHC Responses	.30	255.00
08/05/20 JSF	Telephone Call(s) Participate in Weekly AHC Call with All Members re: Updates to Committee	.70	595.00
08/05/20 JSF	Examine Documents Review of Updates to AHC on Recently Filed Pleadings and Filing of Proofs of Claim by Other Groups	.70	595.00
08/05/20 MLC	Conference call(s) Weekly meeting of AHC	.70	920.50
08/05/20 MLC	Analysis of Memorandum Review and revision to proposed agenda for AHC weekly meeting	.20	263.00
08/11/20 MLC	Telephone Call(s) Telcon with Ken Eckstein re follow up and next steps	.60	789.00
08/12/20 JSF	Telephone Call(s) Participate in Call with Representatives of Certain States to Preview Before AHC Call Certain Issues re: States' Claim and Discussions with Debtors	.50	425.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/12/20 JSF	Telephone Call(s) Participate in Weekly Update Telephonic Meeting with AHC	1.50	1,275.00
08/12/20 MLC	Conference call(s) Weekly meeting of AHC committee	1.40	1,841.00
08/12/20 MLC	Analysis of Memorandum Review and revision to agenda for meeting of AHC	.30	394.50
08/13/20 MLC	Draft/revise Review of summary of AHC mediation to date and suggested revisions to email to AHC	.60	789.00
08/17/20 JSF	Examine Documents Examine Documents: Review of Update E-Mails to AHC re: NAACP Motion to Intervene and NAACP Letter	.30	255.00
08/17/20 MLC	Correspondence Correspondence by KL to AHC members re summary of various updates	.60	789.00
08/19/20 JSF	Telephone Call(s) Telephone Call: Participate in Weekly Meeting of Ad Hoc Committee to Provide Updates to AHC	1.00	850.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/19/20 MLC	Conference call(s) Conference call weekly meeting with AHC members and counsel	1.00	1,315.00
08/19/20 MLC	Draft/revise Reviewed and revised agenda for AHC meeting	.30	394.50
08/25/20 JSF	Examine Documents Review of Updates to AHC re: Discovery Stipulation and NAACP Motion to Intervene	.40	340.00
08/26/20 MLC	Conference call(s) Conference call with AHC counsel	.70	920.50
TOTAL PHASE PU09		11.80	\$13,006.00

Phase: PU11

PLAN & DISCLOSURE STATEMENT

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/12/20 MLC	Conference call(s) Conference call with Eckstein, Ringer and certain AHC states re next steps in mediation sessions re: Plan Structure and Post-Emergence Entity and Sacklers	.50	657.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/13/20 JSF	Examine Documents Examine Documents: Review of Mediation Order re: Parameters of Mediation and Authority of Mediators to Mediate Additional Issues Re: Plan	.40	340.00
08/13/20 MLC	Conference call(s) Conference call re sources and uses presentation by KL	1.00	1,315.00
08/14/20 JSF	Examine Documents Examine Documents: Review of Memo to AHC Outlining Issues re: Plan and Treatment of States' Claims	1.30	1,105.00
08/16/20 JSF	Prepare Legal Papers Prepare Legal Documents: Begin to Draft Information Sharing Agreement and Protocols with Debtor for Plan Discussions	1.10	935.00
08/16/20 JSF	Telephone Call(s) Call with MLC and MAP re: Plan and Claim Issues to Research for Discussions with Debtors	.70	595.00
08/16/20 MLC	Correspondence Correspondence among AHC counsel re mediation process and next steps re: Plan	.40	526.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/18/20 JSF	Examine Documents Examine Documents: Review of Artticles and Litigation Briefs re: Analysis of Anticipated Plan Issues and Claim Analysis Issues	1.20	1,020.00
08/26/20 JKH	Diary & Docket Review order extending exclusive filing and solicitation periods and calendaring same	.20	61.00
TOTAL PHASE PU11		6.80	\$6,554.50
		TOTAL FOR SERVICES	\$149,450.50

**EXHIBIT D**

**Summary of Actual and Necessary Expenses**

**SUMMARY OF ACTUAL AND NECESSARY DISBURSEMENTS FOR THE  
STATEMENT PERIOD**

<b>Expense Category</b>	<b>Total Expenses</b>
Conference Call(s)	\$661.96 <sup>1</sup>
Electronic Research	\$27.00
<b>TOTAL:</b>	<b>\$688.96</b>

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<sup>1</sup> This relates to the following conference calls: (1) conference call held on July 1, 2020, lasting approximately 40 minutes, in which 11 people participated; (2) conference call held on July 14, 2020, lasting approximately 25 minutes, in which 2 people participated; (3) conference call held on July 14, 2020, lasting approximately 15 minutes, in which 5 people participated; (4) conference call held on July 15, 2020, lasting approximately 20 minutes in which 5 people participated; (5) conference call held on July 16, 2020, lasting approximately 15 minutes in which 3 people participated; (6) conference call held on July 21, 2020, lasting approximately 55 minutes in which 8 people participated; (7) conference call held on July 30, 2020, lasting approximately 25 minutes in which 4 people participated; and (8) CourtSolutions appearance for a hearing held on August 26, 2020.



**EXHIBIT E**

**Expense Detail**

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DISBURSEMENTS FOR YOUR ACCOUNT

Conference Call(s)	661.96
Electronic Research	27.00
	<hr/>
TOTAL DISBURSEMENTS	688.96